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Chancellery

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Mr John Carter
Committee Secretary
Senate Education, Employment and Workplace Relations Committee
PO Box 6100
Parliament House
Canberra ACT 2600

Email: eewr.sen@aph.gov.au

Dear Mr Carter,

Please find attached RMIT's submission to the Senate Education, Employment and Workplace Relations Committee Inquiry into the Welfare of International Students.

If you have any queries regarding this submission please contact Katrina Woodland, Senior Manager Planning and Research at katrina.woodland@rmit.edu.au or 03 9925 9707.

Yours sincerely,



Professor Margaret Gardner AO
Vice-Chancellor and President

RMIT University Submission to the Senate Inquiry into the Welfare of International Students

Introduction

RMIT University welcomes the opportunity to provide input into the Senate Inquiry into the Welfare of International Students. RMIT is a global university of technology with over 25,000 international students studying in Australia and offshore across both TAFE and higher education - the highest number of international students of any Australian university. International students comprise 37% of our total student population complementing the diversity of our domestic student population of which 24% is born overseas.¹ Providing a safe and positive learning experience for our students is a key priority for RMIT.

As a member of the Australian Technology Network (ATN), RMIT supports the recommendations put forward in its response and offers the ideas in this paper for further consideration.

In framing our response to the terms of reference RMIT wishes to emphasise the following broad points:

- The importance of the sector as a major export earner with national employment, network building and reputation benefits argues for a well resourced and co-ordinated response from governments and the sector.
- Education providers have a major responsibility for the welfare of international students; however, a number of factors that adversely effect students are beyond the scope of providers to control.
- Many of the issues facing international students – particularly relating to health, safety and wellbeing - are inter-related and, therefore, require a comprehensive and integrated response by policy makers, providers and the wider community

RMIT wishes to emphasise that the key factor determining the overall welfare of international students and the reputation of the education sector is an appropriate regulatory framework. To this end, RMIT believes that the considerations of the Committee should be informed by the following principles:

- Educational providers should be subject to a clear and significant set of standards as the basis for commencing and continuing operation
- Quality audits should be guided by the level of risk posed by the provider rather than subjecting all providers, irrespective of their record, to the same set of audits. Risk should be determined not by the scale of the provider's operations, but by track record *relative* to scale.
- New providers should be subject to regular (eg six-monthly) audits in the early years of establishment to ensure quality of operations.
- Development of standards and controls should be considered in the context of the upcoming ESOS review and the development of the Tertiary Education Quality and Standards Agency.
- Standards, monitoring and compliance should be guided by the principle of parsimony: they should evidence performance on important issues and their administration should be clear and simple.
- Policy responses should also include a focus on service development through the recognition and resourcing of best practice exemplars to balance the need for regulation, standards and compliance.

¹ Source: RMIT University 2008 Pocket Statistics

A co-ordinated national approach

RMIT supports recent initiatives by the Commonwealth and State governments to address key issues facing international students. These include the review of the *Education for Overseas Students Act 2000*, the development of a *National International Student Strategy* and various state based initiatives such as quality audits of private providers and safety responses by policing authorities. There are also, however, a number of other interested organisations commencing initiatives – for example the City of Melbourne and the Committee for Melbourne. The admirable responsiveness of all these agencies, unless co-ordinated, runs the risk of delivering confusing and contradictory responses.

To avoid a fragmented approach RMIT recommends that the Committee seek resources to support a co-ordinated national approach based on inter-governmental and sectoral dialogue.

Student safety

Ensuring the safety and wellbeing of international students is a *shared responsibility* across a number of agencies involved in the recruitment, provision and regulation of international education. While education providers are charged with providing safety information for students and maintaining a secure campus environment, responsibility beyond these limited bounds rests with state and federal authorities.

RMIT welcomes the recent state based police responses to address the safety concerns of international students. One of the key issues in developing such responses is the need for better collection of crime data. Victoria Police, for instance, collects data on the basis of appearance and does not record the residency/visa status of crime victims. Accurate information on the extent and nature of safety issues confronting international students would better inform evidence-based policy development by both government and education providers. It would also inform more accurate media reporting of international student safety issues.

Campus safety is a key concern for universities. Universities have a range of services in place to ensure student safety including joint initiatives with external agencies. RMIT, for instance, partners with the Victoria Police, Metropolitan Fire Brigade, and Consumer Affairs Victoria to deliver information to students on safety and related topics. RMIT is also piloting a new 'Creating a Safer Community' project to monitor and manage high risk and threatening behaviour on campus and improve student safety. These initiatives (and those being pioneered by other institutions) should inform a national approach to international student safety led by policing authorities who are ultimately responsible for community safety.

RMIT recommends that the Commonwealth and State governments develop an International Students Security and Safety Strategy in collaboration with police, education providers and other key stakeholders.

RMIT recommends that the government work with the sector to identify mechanisms to determine, develop and promote best practice in international student services and safety.

Student visa requirements

Student visa requirements need to be reviewed to ensure that international students have sufficient financial reserves to cover their cost of living and to avoid exposure to harmful or exploitative situations. Anecdotal evidence suggests that many students in private colleges, for instance, are financially at risk having taken out loans to meet the personal support requirements of their student visas. As a result they are often dependent on precarious employment including shift work and are more likely to travel on trains late at night to cheaper outer suburban housing. Given that the majority of recent attacks on international students in

Victoria, for instance, have occurred on or around public transport this increases the risk of harm for these students. Financial vulnerability is further exacerbated by the inconsistent availability of public transport concessions for international students across Australia.

International student visas are currently classified by the level of potential immigration risk based on both country of origin and education sector or level (eg Schools, VET, Higher Education and Postgraduate Research). The higher the assessment level, the greater the evidence an applicant is required to demonstrate to support their claims for the grant of a student visa. Scope exists to further refine this classification system to distinguish between students studying at private and public vocational providers and to include more stringent requirements for students who may be exclusively seeking migration pathways through private colleges and are financially at risk.

RMIT recommends that the adequacy of the personal support requirement for the Temporary Visa (International Student Visa) be assessed and consideration be given to its indexation

Appropriate pathways to permanent residency

There is significant evidence to indicate that the migration policy framework has been a major driver of selective and rapid growth in international education over recent years, particularly in private vocational provision. AEI data shows that between 2005 and 2008 enrolments at private VET providers increased by 195% (50,022 to 147,531) and accounted for 84% of international VET enrolments overall. In contrast, international higher education enrolments grew by only 12% over the same period. The growth of Indian student enrolments in private VET is even more stark increasing 1724% (from 2,605 to 47,512) between 2005 and 2008.²

This is further evidenced by the selective nature of this growth in occupations on the Migration Occupations in Demand List (MODL) and Critical Skills List published by the Department of Immigration and Citizenship. For example, private VET enrolments in the 'Food, Hospitality and Personal Services' field of education, which includes cookery and hairdressing (currently listed on MODL), grew 751% between 2005 and 2008.

While recent changes to the General Skilled Migration program address the immediate issue of re-aligning skill needs to changing labour force requirements, there is a need to review the relationship between skilled migration and education policy frameworks to better support both national labour market and quality educational outcomes. This requires a whole-of-government approach that takes account of the role of national and state regulatory frameworks (eg ESOS) in supporting these outcomes.

RMIT recommends that Skills Australia's proposed governance and advisory arrangements for the national training system serve as the mechanism to inform skilled migration policy settings to support sustainable growth in international education and quality outcomes for students.

Social inclusion and adequate and affordable accommodation

Education providers play a key role in promoting social inclusion for international students through integrated learning and teaching environments and targeted student support services. RMIT commends the recent Department of Education, Employment and Workplace Relations initiative to publish best practice programs that promote the social integration of international students. We support the continued promotion of such initiatives by government and welcome the proposed re-introduction of the Student Amenities Fee as a key means of funding these types of activities. There is also scope for the Commonwealth to fund and promote exemplars of social inclusion partnerships with industry and the community as an acknowledgement of the

² Australian Education International, International Student Statistics, 2008

significant contribution by international students to the economic, social and cultural life of the nation.

RMIT recommends that:

- *Targeted Commonwealth government funding is provided to promote best practice examples of social inclusion programs for international students with a focus on partnerships between education providers, industry and the community.*
- *Public transport concession is made universally available to international students to promote social inclusion and reduce financial burden.*

The availability, affordability and quality of accommodation are key factors in international students' ability to fully engage with their educational experience and community life. Educational providers have a major responsibility to provide information and services to support students in sourcing safe and affordable housing. Many providers are, however, constrained in their capacity to provide on-campus accommodation, particularly those located in inner-city locations. This is compounded by the lack of private rental options currently available in most capital cities – for example the vacancy rate in inner-city Melbourne for example is less than 1%. As a result, international students are often forced to live considerable distances from campus contributing to the safety and cost-of-transport issues highlighted above.

The lack of affordable metropolitan housing is also an issue for Australian students relocating from rural and regional areas and a potential barrier to universities meeting the new Commonwealth equity targets. RMIT believes that government has a lead role in increasing the supply of affordable housing for students by exploring a range of models of housing provision. Options to consider include: tax incentives for institutional funds (eg superannuation funds) in affordable housing for students; a housing co-operative partnership model between government and universities; and, increasing the number of appropriately regulated home-stay arrangements. A body of evidence to support this approach is readily available³ and initiatives could be supported in part through the Education Investment Fund.

RMIT recommends that the Commonwealth and State governments take a pro-active approach to increasing the supply of affordable accommodation for students, including consideration of incentives and partnership arrangements with the education sector.

Employment rights and protection from exploitation

Ensuring international students are not exposed to exploitative work practices is primarily the responsibility of government agencies; however, education providers play a key role in informing students of their employment rights, visa work limitations and sourcing suitable jobs. International students place a high demand on university student services (including employment services) given their lack of ready access to family and other support. Evidence suggests this demand is growing. At RMIT, for instance, demand for student services over the past year has increased by 44%, with the strongest growth in legal services (185%), and international support services (125%) and employment services (52%).

For universities to continue to meet international student demand, and in anticipation of the growth of equity enrolments, new and better models of student services that ensure the optimum use of resources will be required. Government funding directed to developing and promoting best practice models of student services represents a cost effective response to addressing this issue. They can also reduce the need for subsequent recourse to interventions based on regulation and compliance. In the interests of consistency across the education

³ For example, the University of Melbourne research report 'Transnational and Temporary: students, community and place-making in central Melbourne' (2009)

sector this could include funded provision by major providers to smaller providers where these services do not exist or are inadequate.

RMIT recommends that targeted Commonwealth government funding is provided to promote best practice models of student service delivery to ensure high quality support is available to all international students.

Conclusion

In conclusion RMIT strongly supports the active role being taken by the Committee and governments in ensuring a sustainable and respected international education industry. RMIT believes that the objectives of government can be best achieved through a co-ordinated service-focused approach based on supporting further development of the many exemplars across the sector. Any additional regulation and compliance requirements should be kept to a minimum and targeted towards those areas and providers where problems have been identified.

More information

For further information on this submission please contact Katrina Woodland, Senior Manager Planning and Research on katrina.woodland@rmit.edu.au or 03 9925 9707.